

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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|---|----------------------------|
| In re                                     | ) Chapter 11               |
|   | )                          |
| SEARS HOLDINGS CORPORATION, <i>et al.</i> | ) Case No.: 18-23538 (RDD) |
|   | )                          |
| Debtors.                                  | ) (Jointly Administered)   |
|   | )                          |
|   | )                          |

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**REQUEST FOR NOTICES**

**PLEASE TAKE NOTICE** that pursuant to Rule 2002 of the Bankruptcy Rules, Carter Ledyard & Milburn LLP, counsel for The Bank of New York Mellon Trust Company, N.A., as successor Trustee (the "Successor Trustee") under (1) the Indenture dated as of May 15, 1995, as supplemented and the Indenture dated as of October 1, 2002, each with Sears Roebuck Acceptance Corporation requests that all notices given or required to be given and all papers served or required to be served in these cases be given to and served upon the following:

Carter Ledyard & Milburn LLP  
Counsel for The Bank of New York Mellon Trust Company, N.A., as Successor Trustee  
2 Wall Street  
New York, NY 10005  
Attention: James Gadsden  
Telephone: (212) 238-8607  
Facsimile: (212) 732-3232  
e-mail: [bankruptcy@clm.com](mailto:bankruptcy@clm.com)

**PLEASE TAKE FURTHER NOTICE** that the foregoing request includes notices referred to in Rule 2002 of the Bankruptcy Rules and also includes, without limitation, any notices of orders, pleadings, motions, applications, complaints, demands, hearings, plans, disclosure statements, requests, petitions, objections, answering or reply papers, memoranda and briefs in support of any of the foregoing and any other documents brought before this Court with respect to these cases.

**PLEASE TAKE FURTHER NOTICE** that this request and any subsequent appearance, pleading, claim, or suit, is not intended, nor shall be deemed, to waive the Trustee's (i) right to have final orders in non-core matters entered only after *de novo* reviewed by a United States District Court Judge; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn by the United States District Court Judge in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs or recoupments to which the Trustee is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved.

Dated: New York, New York  
October 16, 2018

**CARTER LEDYARD & MILBURN LLP**



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Counsel for The Bank of New York Mellon Trust  
Company, N.A., as Successor Trustee